

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MEREDITH ELIZALDE, individually
and as Administratrix of **the Estate of**
NICOLAS ELIZALDE, a minor, deceased
219 Gerald Drive
Aston, PA 19014

CIVIL ACTION NO: 2:24-cv-4494

Plaintiff,

v.

**THE SCHOOL DISTRICT OF
PHILADELPHIA**
440 N. Broad Street, Philadelphia, PA
Philadelphia, PA 19130;

Defendant.

**STIPULATION TO EXTEND TIME TO FILE RESPONSE
TO DEFENDANT’S 12(B)(6) MOTION**

Plaintiff Meredith Elizalde, individually and as Administratrix of the Estate of Nicolas Elizalde, by and through counsel, respectfully requests the Court’s approval of the following stipulation:

1. Plaintiff filed this action on August 27, 2024.
2. Defendant The School District of Philadelphia filed a motion to dismiss Plaintiff’s Complaint pursuant to Federal Rule of Procedure 12(b)(6).
3. Plaintiff’s counsel and defense counsel filed a stipulation to extend the response date to January 13, 2025, and this Court approved the extension.
4. Plaintiff’s counsel has corresponded with counsel for the Defendant, Jeffrey M. Scott, who has consented to an additional fourteen (14) days for Plaintiff to file her answer.
5. Plaintiff will file her response to Defendant’s motion on or before January 27, 2025.

KLINE & SPECTER, PC

BY: /s/ Kimberly M. Collins
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DATED: January 9, 2025

ARCHER & GREINER, PC

BY: /s/ Jeffrey M. Scott
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Attorneys for Defendant

DATED: January 9, 2025

Approved By: /s/ Mitchell S. Goldberg
GOLDBERG, J.